

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA**

**Alexandria Division**

UNITED STATES OF AMERICA

v.

MICHAEL JAIME INOFUENTES,

*Defendant.*

Case No. 1:24-MJ-443

**AFFIDAVIT IN SUPPORT OF A  
CRIMINAL COMPLAINT AND AN ARREST WARRANT**

I, Samantha J. Fisher, being duly sworn, depose and state as follows:

**INTRODUCTION AND BACKGROUND**

1. I submit this affidavit in support of a criminal complaint and arrest warrant charging Michael Jamie INOFUENTES with engaging in illicit sexual conduct in a foreign place, in violation of Title 18 U.S.C § 2423(c) and (g)(2). For the reasons set forth below, I submit that probable cause exists to believe that between at least March 22, 2024, and April 2, 2024, INOFUENTES, a U.S. citizen, engaged in a commercial sex act with a minor child in Medellin, Colombia.

2. I am a Special Agent with the Homeland Security Investigations (HSI) and have been so employed since February 2022. I am currently assigned to the HSI Office of the Special Agent in Charge, Washington, D.C. ("HSI DC"), Child Exploitation Group. I investigate criminal violations relating to child exploitation and child pornography, including violations pertaining to the illegal distribution, receipt, transportation, possession, and access with intent to view of child pornography, in violation of 18 U.S.C. § 2252(a). I have received training in the area of child

pornography and child exploitation, and I have had the opportunity to observe and review numerous examples of child pornography, as defined in 18 U.S.C. § 2256(8), including computer media. Through my experience and training, I can identify child pornography when I see it. I have training and experience in the enforcement of the laws of the United States, including the preparation, presentation, and service of subpoenas, affidavits, search warrants, and arrest warrants. As a federal agent, I am authorized to investigate violations of laws of the United States and, as a law enforcement officer, I am authorized to execute warrants issued under the authority of the United States.

3. The facts and information in this affidavit are based upon my personal observations, my training and experience and information obtained from other agents and witnesses. This affidavit is intended to show simply that there is sufficient probable cause for the requested complaint and arrest warrant and does not set forth all my knowledge about this matter.

#### **STATUTORY AUTHORITY AND DEFINITIONS**

4. Title 18 U.S.C. § 2423(c) prohibits any United States citizen or alien admitted for permanent residence who travels in foreign commerce or resides, either temporarily or permanently, in a foreign country, from engaging in any illicit sexual conduct with another person.

5. The term “illicit sexual conduct,” as defined in 18 U.S.C. § 2423(g)(2), includes any commercial sex act (as defined in section 1591) with a person under 18 years of age.

6. A “commercial sex act,” as defined in 18 U.S.C. 1591(e)(3), means any sex act, on account of which anything of value is given to or received by any person.

7. The term “minor,” as defined in 18 U.S.C. § 2256(1), means any person under the age of 18 years.

8. Pursuant to 18 U.S.C. § 3238, venue for offenses begun or committed upon the high seas, or elsewhere out of the jurisdiction of any particular State or district, shall be in the district in which the offender is arrested or is first brought; but if such offender is not so arrested or brought into any district, an indictment or information may be filed in the district of the last known residence of the offender, or if no such residence is known the indictment or information may be filed in the District of Columbia.

9. As explained below, INOFUENTES was first arrested in the Eastern District of Virginia on November 4, 2024, and will be first brought to the Eastern District of Virginia on November 5, 2024.

### **PROBABLE CAUSE**

#### **A. Encounter at Miami International Airport**

10. On November 1, 2024, INOFUENTES, a citizen of the United States, born on XX/XX/1980 [redacted], arrived at Miami International Airport on American Airlines flight 924 from Medellin, Colombia. Upon arrival, INOFUENTES was referred by U.S. Customs and Border Protection (CBP) for secondary inspection.

11. INOFUENTES was referred to secondary inspection based on his suspected involvement in child sex trafficking in Colombia. Western Union records obtained during HSI's investigation into a suspected Colombian child sex trafficker revealed that INOFUENTES completed five wire transfers to the suspected trafficker. The wire transfers were sent on five different dates in October 2023 for different amounts between \$13 and \$47.

12. Pursuant to their border search authority, CBP officers escorted INOFUENTES into the CBP secondary inspection area to search his baggage and person for contraband and

evidence related to ongoing transnational crime. INOFUENTES was in possession of an iPhone 14 (SN LQ9M97KQ19) and a Galaxy Z Fold 6 cell phone (SN RFCX70JRE2L).

**B. Manual Inspection of INOFUENTES's Electronics**

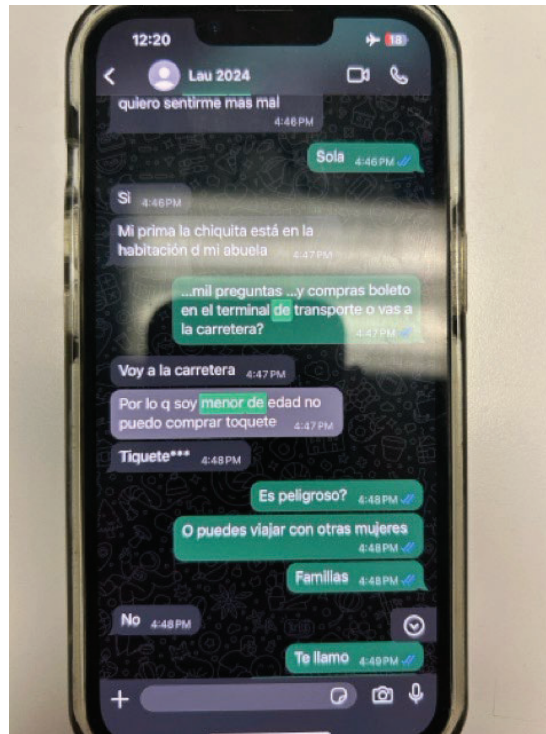
13. CBP and HSI agents performed a basic manual inspection of the devices. During the inspection of INOFUENTES's iPhone 14, agents observed WhatsApp messages between INOFUENTES and a contact saved as "[MV1] 2024."<sup>1</sup> The WhatsApp chat spanned February 26, 2024, through April 14, 2024, and in it MV1 told INOFUENTES she was a minor. As depicted in the screenshots below, during the chat, INOFUENTES and MV1 discussed meeting at a hotel in Medellin for sex and they discussed how much money INOFUENTES would pay MV1 for sex.<sup>2</sup>

14. For example, on March 24, 2024, MV1 discussed her status as a minor with INOFUENTES. MV1 told INOFUENTES, "Because I am a minor I cannot buy a ticket." INOFUENTES replied, "it's dangerous?"

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<sup>1</sup> The contact name is redacted here to protect the privacy of a minor.

<sup>2</sup> The WhatsApp messages are in Spanish and were reviewed and translated for me by Spanish-speaking law enforcement agents.



15. As reflected below, on March 26, 2024, INOFUENTES discussed a payment to MV1. INOFUENTES stated, “100.000-200.000” and then said, “Is that enough money?” Later, INOFUENTES stated, “Do you prefer another man” and then, “I understand.” INOFUENTES said, “Here in San Diego then” and then “There is a hotel.” The following day, on March 27, 2024, INOFUENTES said, “You don’t want to work?” MV1 replied, “Yes” and then, “Just for a moment.”



16. Later in the chat, as shown below, MV1 stated, “Tell me how much you are going to pay, be clear.” INOFUENTES stated, “For fuck and cum.”<sup>3</sup> INOFUENTES said, “Ask for it” and “80,000 is not enough.” MV1 replied, “Obviously it’s not enough.”

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<sup>3</sup> As explained to me by a Spanish-speaking agent who travels to Colombia frequently for law enforcement purposes, this message is literally translated as “steak and eggs” however, the term is also slang for “fuck and cum.”



17. Based on my training and experience and discussions I have had with other HSI agents, I know that San Diego is the name of a street in Colombia that is well known as a place where individuals go to buy sex from sex trafficked children, among other things.

### C. Miami Interview of INOFUENTES

18. On November 1, 2024, an HSI special agent and a CBP task force officer interviewed INOFUENTES at Miami International Airport. INOFUENTES was read his Miranda warnings and acknowledged his rights and agreed to speak with law enforcement.

19. INOFUENTES stated he is a United States citizen, was born in New York and works in Virginia. INOFUENTES stated he has two children who live in Medellin, Colombia with their mother. INOFUENTES stated that for the past three years, he has rented an apartment in Colombia and is a resident of Colombia. INOFUENTES stated he travels to Colombia frequently to visit his children, pay rent, and play in a mariachi band there.



20. During the interview, INOFUENTES stated he believed MV1 is 17 years old. At first, he denied having sex with her, but he later admitted they had a sexual relationship. INOFUENTES stated MV1 is currently pregnant and based on the timeline, it is possible that he is the father of the baby. INOFUENTES was shown a picture found in the WhatsApp messages with MV1 on his phone that depicted a girl laying in a bed, holding a stuffed animal. INOFUENTES had sent the photo to MV1 on March 9, 2024. INOFUENTES stated that the photo is MV1, and he took the picture in his bed at his apartment in Medellin. INOFUENTES denied paying MV1 for sex and stated that the discussion in WhatsApp regarding money was related to paying MV1's bills.

21. INOFUENTES stated he has a 7-year-old child, and the mother of the child is currently 24 years old. INOFUENTES admitted that he impregnated her when she was 17 years old.

22. When the interview concluded, INOFUENTES left the Miami airport and returned to his residence in Vienna, Virginia. His electronic devices remained detained with HSI.

23. Travel records show that INOFUENTES traveled from the U.S. to Colombia twice in early 2024. On January 27, 2024, he traveled from Dulles to Colombia with a connection in Panama. He returned to the U.S. on March 5, 2024. On March 22, 2024, he traveled from Baltimore/Washington International Thurgood Marshall Airport to Colombia, with connections in Chicago and Panama. He returned to the U.S. on April 2, 2024, at Dulles.

#### **D. Encounter with INOFUENTES at Dulles International Airport**

24. On November 4, 2024, INOFUENTES arrived at Dulles International Airport in the Eastern District of Virginia and attempted to board Avianca flight 247 to Bogota, Colombia, with a final destination of Medellin, Colombia. An HSI special agent and CBP task force officer



encountered INOFUENTES on the jet bridge as he boarded the plane and brought him to secondary inspection pursuant to their border search authority.

25. CBP searched INOFUENTES's person and baggage for contraband and evidence of ongoing transnational crime. INOFUENTES was in possession of a Galaxy Note II (S/N: RV1D334KOEK1303), Apple iPad (S/N: DMPRK5UHG5VY), and a ZTE cell phone (S/N: 329F66200B1). All three devices were detained for further inspection.

26. Law enforcement escorted INOFUENTES to an interview room. He was read his Miranda warnings and acknowledged his rights and agreed to speak with law enforcement. INOFUENTES stated he was going back to Colombia to pay rent and move his motorcycle which was parked in a public parking spot. INOFUENTES again confirmed the photo of a minor laying on a bed with a stuffed animal was MV1. INOFUENTES stated he is attracted to young females.

27. INOFUENTES was placed under arrest and brought to the Alexandria Adult Detention Center.

**E. MV1 is 16 years old**

28. In a WhatsApp message to INOFUENTES, MV1 provided her full name and cedula number.<sup>4</sup> Law enforcement searched MV1's cedula number in a Colombian government database and confirmed MV1's date of birth and her age (16 years old).


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<sup>4</sup> A cedula number is a unique number assigned to each Colombian citizen, like a U.S. social security number.

### CONCLUSION

29. Based on the above information, I respectfully submit that there is probable cause to believe that between at least March 22, 2024, and April 2, 2024, in Colombia, INOFUENTES engaged in illicit sexual conduct in a foreign place in violation of 18 U.S.C. § 2423(c) and (g)(2). Therefore, I respectfully request that a criminal complaint and arrest warrant be issued for Michael Jaime INOFUENTES.

Respectfully submitted,



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Samantha J. Fisher, Special Agent  
Homeland Security Investigations

Subscribed and sworn to in accordance with Fed. R. Crim. P. 4.1 by telephone on November 5, 2024:



Digitally signed by Ivan Davis  
Date: 2024.11.05 13:49:39 -05'00'

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The Honorable Ivan D. Davis  
United States Magistrate Judge